

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. MAGUIRE
CLERK OF COURT

2024 MAY -2 AM 11:40

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

WILBERT A. ROMERO-NATERA

Defendant.

CASE NO.

JUDGE

INDICTMENT

18 U.S.C. §§ 924(c)(1)(A)(i)-(ii)

18 U.S.C. § 1951

THE GRAND JURY CHARGES:

COUNT 1
(Hobbs Act Robbery)

1. At all times material to this Indictment, the Best Western Executive Inn, located at 4026 Jackpot Road, Grove City, Ohio, was engaged in commercial activities in and affecting commerce, that is, the said Best Western Executive Inn is a franchise operated by Best Western Hotel and Resorts Brand which has its corporate headquarters in Phoenix, Arizona, and includes more than 2,000 hotels in North America. The Best Western Executive Inn engages in business accepting credit cards and therefore is engaged in interstate commerce as it is engaged in transactions with monetary values that move in interstate commerce from within the State of Ohio to outside of the State of Ohio.

2. On or about March 25, 2021, in the Southern District of Ohio, the defendant, **WILBERT A. ROMERO-NATERA**, did knowingly and unlawfully obstruct, delay, and affect

commerce, and the movement of articles and commodities in such commerce, by robbery, in that the defendant, **WILBERT A. ROMERO-NATERA**, did unlawfully take and obtain United States currency belonging to the Best Western Executive Inn, from a person having lawful custody of such currency and against that person's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the person, by robbery of the person and hotel with a firearm.

In violation of 18 U.S.C. § 1951.

COUNT 2

(Brandishing a Firearm During and in Relation to a Crime of Violence)

3. On or about March 25, 2021, in the Southern District of Ohio, the defendant, **WILBERT A. ROMERO-NATERA**, did knowingly use and carry and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Hobbs Act robbery, in violation of 18 U.S.C. § 1951, as alleged in Count One of this Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i)-(ii).

COUNT 3

(Hobbs Act Robbery)

4. At all times material to this Indictment, the Quality Inn, located at 2055 Brice Road, Columbus, Ohio, was engaged in commercial activities in and affecting commerce, that is, the said Quality Inn is a franchise operated by Choice Hotels International Brands which has its corporate headquarters in Rockville, Maryland, and includes more than 2,000 hotels in North

America. The Quality Inn engages in business accepting credit cards and therefore is engaged in interstate commerce as it is engaged in transactions with monetary values that move in interstate commerce from within the State of Ohio to outside of the State of Ohio.

5. On or about March 30, 2021, in the Southern District of Ohio, the defendant, **WILBERT A. ROMERO-NATERA**, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, in that the defendant, **WILBERT A. ROMERO-NATERA**, did unlawfully take and obtain United States currency belonging to the Quality Inn, from a person having lawful custody of such currency and against that person's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the person, by robbery of the person and hotel with a firearm.

In violation of 18 U.S.C. § 1951.

COUNT 4
(Brandishing a Firearm During and in Relation to a Crime of Violence)

6. On or about March 30, 2021, in the Southern District of Ohio, the defendant, **WILBERT A. ROMERO-NATERA**, did knowingly use and carry and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Hobbs Act robbery, in violation of 18 U.S.C. § 1951, as alleged in Count Three of this Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i)-(ii).

COUNT 5
(Hobbs Act Robbery)

7. At all times material to this Indictment, the Deluxe Inn, located at 10772 Lancaster Road, Hebron, Ohio, was engaged in commercial activities in and affecting commerce, that is, the said Deluxe Inn is an independently owned and operated hotel that engages in business accepting credit cards and U.S. currency and therefore is engaged in interstate commerce as it is engaged in transactions with monetary values that move in interstate commerce from within the State of Ohio to outside of the State of Ohio.

8. On or about March 30, 2021, in the Southern District of Ohio, the defendant, **WILBERT A. ROMERO-NATERA**, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, in that the defendant, **WILBERT A. ROMERO-NATERA**, did unlawfully take and obtain United States currency belonging to the Deluxe Inn, from a person having lawful custody of such currency and against the person's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the person, by robbery of the person and hotel with a firearm.

In violation of 18 U.S.C. § 1951.

COUNT 6
(Brandishing a Firearm During and in Relation to a Crime of Violence)

9. On or about March 30, 2021, in the Southern District of Ohio, the defendant, **WILBERT A. ROMERO-NATERA**, did knowingly use and carry and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the

United States, that is, Hobbs Act robbery, in violation of 18 U.S.C. § 1951, as alleged in Count Five of this Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i)-(ii).

COUNT 7
(Hobbs Act Robbery)

10. At all times material to this Indictment, the Red Roof Inn, located at 10668 Lancaster Road, Hebron, Ohio, was engaged in commercial activities in and affecting commerce, that is, the said Red Roof Inn is an economy hotel chain operated by Red Roof Inns, Inc., which has its corporate headquarters in New Albany, OH. The Red Roof Inn engages in business accepting credit cards and therefore is engaged in interstate commerce as it is engaged in transactions with monetary values that move in interstate commerce from within the State of Ohio to outside of the State of Ohio.

11. On or about March 30, 2021, in the Southern District of Ohio, the defendant, **WILBERT A. ROMERO-NATERA**, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, in that the defendant, **WILBERT A. ROMERO-NATERA**, did unlawfully take and obtain United States currency belonging to the Red Roof Inn, from a person having lawful custody of such currency and against that person's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the person, by robbery of the person and hotel with a firearm.

In violation of 18 U.S.C. § 1951.

COUNT 8
(Brandishing a Firearm During and in Relation to a Crime of Violence)

12. On or about March 30, 2021, in the Southern District of Ohio, the defendant, **WILBERT A. ROMERO-NATERA**, did knowingly use and carry and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Hobbs Act robbery, in violation of 18 U.S.C. § 1951, as alleged in Count Seven of this Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i)-(ii).

A TRUE BILL.

s/Foreperson
FOREPERSON

KENNETH L. PARKER
United States Attorney


TIMOTHY D. PRICHARD (0059455)
Assistant United States Attorney